

Alan F. Ciamporcero
Group President

1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 383-6410

PACIFIC X TELESIS
Group-Washington

May 21, 1996

RECEIVED

MAY 21 1996

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Dear Mr. Caton:

Re: CC Docket No. 92-237, *Administration of the North American Numbering Plan*

On behalf of Pacific Telesis Group, please find enclosed an original and six copies of its "Further Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosure

100-411000-1000
4/1/2000



Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

MAY 21 1996

DELETED
APR 24 1996

In the Matter of

Administration of the
North American Numbering Plan

CC Docket No. 92-237

FURTHER COMMENTS OF PACIFIC TELESIS GROUP

The Commission has asked parties to refresh the record in this docket on the issue of the appropriate length of the transition period needed for recognition of 4 digit CICs. The parties are asked to limit comments to updated factual information in light of recent events, and how those events affect the length of the transition period.

The Commission correctly identifies that the assignment of 4 digit Feature Group D ("FGD") CICs has begun. In second quarter 1995, the North American Numbering Plan Administrator ("NANP") began assigning 4 digit FGD CICs. The industry agreed that only CICs beginning with "5" or a "6" would be assigned during the transition period, because of dialing conflicts with other 3 digit CICs. So, during the course of the transition period, only 2,000 CICs are able to be assigned.

Two companies cannot use the same CIC. Any carrier who wants to be able to be accessed by a customer, whether through presubscription or by casual dialing

through an access code, must have a CIC. The Commission correctly identifies that the passage of the Telecommunications Act of 1996, the goal of which is to increase competition in the telecommunications industry, will potentially increase the number of carriers needing a CIC. In fact, incumbents such as Pacific have an increased need for CICs since we now need to meet local exchange competition by deploying CICs for presubscription purposes, for access code dialing so our customers can reach us from a phone not presubscribed to us, and for long distance uses. Other companies' needs for CICs will also grow, as will needs by new entrants to the industry.

Thus, our concern that a long transition period may lead to an exhaustion of the 2000 FGD CICs in the 5XXX and 6XXX series.¹ Our concern is even more relevant now, and in fact is exacerbated by recent events.

Another new fact not in the record is the current conservation mode of 4 digit FGD CIC assignment. The CIC Assignment Guidelines worked out over many months by the industry, allow 6 CICs per entity. On March 17, 1995, the Commission instructed NANPA, at NANPA's request to impose a limit of 1 4-digit CIC per new applicant. This action was taken in order to forestall a perceived run on CICs resulting from a short-lived technical and tariff requirement of 1 local exchange carrier. (That technical/tariff requirement has since been lifted.)

NANPA suggested conservation because of the concern with premature exhaust of the limited CIC pool during the transition period. The conservation currently imposed

¹ See our Comments filed June 7, 1994 in CC Docket 92-237.

limits CIC assignment to 1 CIC per entity (except under certain circumstances associated with intraLATA presubscription). If the transition period were shorter, such conservation measures would be unnecessary because the entire complement of CICs would be available for assignment. Instead companies must carefully examine their business plans for CIC consumption and usage, and make decisions based on the arbitrary limitation imposed by the NANPA and endorsed by the Commission of 1 CIC per entity.

Carriers are adversely affected by limiting the assignment of CICs to 1 CIC per entity. The limitation may stop a carrier from being able to give its customers an access code for use when customers are not at their presubscribed telephone. Or it could prevent a carrier from deploying a service for which a distinct CIC is needed. Thus, the ability to get multiple CICs assigned, as is contemplated by the Guidelines, will encourage competition. And, the more CICs that are in the pool, the less there is any need for conservation. The Commission should lift the conservation mode, and order a short transition period so that multiple CICs can be assigned. This action will also help to equalize a very inequitable present distribution of CICs.

Prior to expansion of CICs to 4 digits, carriers were limited to 3 CICs per entity. With 4 digit CICs, carriers are presently limited to 1 CIC per entity. Yet, as a result of

mergers and acquisitions, many carriers already have significantly more than their fair share of Feature Group D CICs:

<u>Carrier</u>	<u># of CICs</u>
LDDS/Worldcom	60
MCI	23
LCI/Litel	9
Metromedia	9

The Commission should give the responsibility back to the industry to determine how many CICs are appropriate per entity. Through the forum process, the industry can monitor the consumption of CICs, given the stimulation of the telecommunications industry by virtue of the Act, and decide whether any change is necessary to the agreed-upon number of 6 CICs per entity. The industry envisioned taking on this responsibility. Section 4.5 of the CIC Assignment Guidelines requires an annual review of the number of CICs assignable per entity. This responsibility should be given back to the industry.

The Telecommunications Act also is supposed to encourage competition in the industry. Yet, with a long transition period, these goals of the Telecommunications Act are undermined. During the transition period a casual dialer (i.e., someone who wants to use their preferred carrier while not at their presubscribed location) may be dialing 10XXX if their carrier has a CIC assigned prior to mid-1995, or 101XXXX if their carrier was assigned a CIC after that time. (Ironically, many new long distance carriers and

incumbents like Pacific Telesis will be most harmed since they had no need of a CIC for casual dialing until very recently and have been assigned 4 digit CICs, requiring them to instruct their customers to dial more digits than their competitors.) This dialing differential, in the number of digits needed to reach the preferred carrier, should not be allowed to be continued.

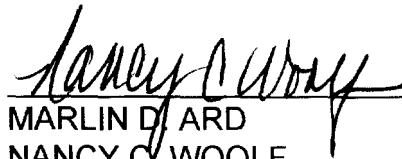
An additional competitive inequity in the current restricted CIC pool is that many carriers use a vanity CIC so that customers can remember the access code (e.g., 10ATT (10288) for AT&T). In the 4 digit CIC arena, however, only CICs beginning with 5 and 6 are being assigned during the transition period. Those companies who would choose a vanity CIC starting with another number are out of luck; they don't have the option of providing their customers with an easy way to remember their access code.

To remedy the inequities which result, we continue to believe that a 6 year transition is much too long, especially with the recent changes in the telecommunications industry. As we stated in the original round of comments in this proceeding, we currently give a transition period of 6-9 months for area code changes (where someone can dial either the old or the new area code). State law mandates a 6 month period for customer education of these changes. For our Statewide Uniform Dialing change, we accomplished all necessary customer education within 12 months for the over 15 million customers affected. We see no policy reasons why the transition period for CIC expansion needs to be substantially different than those periods. We

therefore endorse a 1 year transition period which will give carriers a substantial amount of time to educate customers about the change.

Respectfully submitted,

PACIFIC TELESIS GROUP



MARLIN D. ARD
NANCY C. WOOLF

140 New Montgomery St., Rm. 1523
San Francisco, California 94105
(415) 542-7657

MARGARET E. GARBER

1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 383-6472

Attorneys for Pacific Telesis Group

Date: May 21, 1996